

**FILED**

**JUL 22 2021**

CLERK, U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF ILLINOIS  
EAST ST. LOUIS OFFICE

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA, )  
)  
Plaintiff, )  
)  
vs. )  
)  
KYMONTUS L. MCSHAN, Jr., )  
)  
Defendant. )

CRIMINAL NO.

*21-30116-SPM*

18 United States Code,  
Sections 1951 and 924(c)(1)(A)(ii).

**INDICTMENT**

**THE GRAND JURY CHARGES:**

**COUNT 1**

**INTERFERENCE WITH COMMERCE BY ROBBERY**

On or about the 18<sup>th</sup> of September 2019 in Washington County, Illinois, within the  
Southern District of Illinois,

**KYMONTUS L. MCSHAN, Jr.,**

defendant herein, did take and obtain property consisting of United States currency, cellular  
telephones, and other property from the person or presence of the employee of the Circle K, a  
business that engages in interstate commerce, against the employee's will by means of actual and  
threatened force, violence, and fear of injury to the employee by brandishing a firearm and  
threatening him with it, all in violation of Title 18, United States Code, Section 1951 and 2.

**COUNT 2**

**INTERFERENCE WITH COMMERCE BY ROBBERY**

On or about the 23<sup>rd</sup> of September 2019, in Clinton County, Illinois, within the Southern  
District of Illinois,

**KYMONTUS L. MCSHAN, Jr.,**

defendant herein, did take and obtain property consisting of United States currency, cellular telephones, and other property from the person or presence of the employee of the MotoMart, a business that engages in interstate commerce, against the employee's will by means of actual and threatened force, violence, and fear of injury to the employee by brandishing a firearm and demanding the safe, all in violation of Title 18, United States Code, Section 1951 and Section 2.

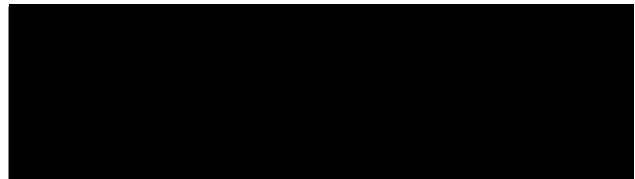
**COUNT 3**


**BRANDISHING A FIREARM DURING A CRIME OF VIOLENCE**


On or about 23<sup>rd</sup> of September 2019, in Clinton County, Illinois, within the Southern District of Illinois,

**KYMONTUS L. MCSHAN, Jr.,**

defendant herein, did knowingly brandish, carry, and use a firearm during and in relation to, and did knowingly possess a firearm in furtherance of, a crime of violence for which he may be prosecuted in a court of the United States, that is, Interference with Commerce by Robbery [Hobbs Act Robbery], in violation of Title 18, United States Code, Section 1951, as charged in Count 2, all in violation of Title 18, United States Code, Section 924(c)(1)(A)(ii).



  
JENNIFER HUDSON  
Assistant United States Attorney

  
STEVEN D. WEINHOEFT  
United States Attorney

Digitally signed by STEVEN  
WEINHOEFT  
Date: 2021.07.20 18:00:59 -05'00'

Recommended Bond: detention